

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**
:
: **STIPULATION**
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IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for Barclays Capital Inc. ("Barclays") and American Express Travel Related Services Company, Inc. ("American Express") that the evidentiary hearing and related discovery will proceed on the following schedule, which may be amended upon agreement between Barclays and American Express and/or by order of the Court:

Service of document requests and/or interrogatories	January 13, 2009
Responses to interrogatories due	January 23, 2009
Responses to document requests and production of documents due ¹	January 26, 2009
Barclays and American Express to identify list of deponents on the basis of information disclosed to date (excluding documents produced in response to the respective document requests) and to meet and confer on deposition scheduling	January 27, 2009
Barclays and American Express to identify additional deponents on the basis of information disclosed to date	January 30, 2009 by 4:00 p.m.
Barclays and American Express to state whether they intend to file pre-hearing briefs and to meet and confer on a briefing schedule	February 2, 2009

¹ Documents must be received by opposing counsel on this date.

Depositions	February 2, 2009 through February 19, 2009
Barclays and American Express to identify and meet and confer regarding any additional deponents (individuals who could not have been identified based on previously disclosed information or for good cause)	February 13, 2009
Barclays and American Express to designate witnesses and exhibits for hearing	February 23, 2009
Hearing	February 26, 2009
Simultaneous post-hearing opening briefs	Four weeks from the close of the hearing by 6:00 p.m. EST
Simultaneous post-hearing reply briefs	Two weeks from the submission of the post-hearing opening briefs by 6:00 p.m. EST

Dated: New York, New York
January 15, 2009

Allen & Overy LLP

Dewey & LeBoeuf LLP

By: /s/ Laura Martin

By: /s/ Donna L. Gordon

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Attorneys for Barclays Capital Inc.

*Attorneys for American Express Travel Related
Services Company, Inc.*

SO ORDERED: January 21, 2009

/s/ James M. Peck
Honorable James M. Peck
UNITED STATES BANKRUPTCY JUDGE